

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ALLISON DVALADZE, an individual

Plaintiff,

v.

DELTA AIR LINES, INC., a Delaware  
Corporation; JOHN DOE 1 and JANE DOE  
1, husband and wife, and the marital  
community composed thereof; and DOES 2  
THROUGH 10,

Defendant.

No.: 2:18-cv-00297-RSL

STIPULATED MOTION FOR AMENDED  
CASE SCHEDULING ORDER  
REGARDING EXPERT DISCLOSURES

NOTED FOR CONSIDERATION:  
November 28, 2018

**STIPULATED MOTION**

The parties mistakenly proposed deadlines for the disclosure of expert testimony, and the disclosure of rebuttal expert testimony far before the cutoff for discovery. Under the prior proposed case scheduling order, which this Court granted, the parties set the expert disclosure deadline for approximately eight months prior to the discovery cut off. This length of time is bound to cause issues and disputes regarding the disclosure of expert testimony, and waste resources through unnecessary supplemental disclosures and increased expert involvement as new information becomes available (which has the potential of altering the expert's opinions).

STIPULATED MOTION FOR AMENDED CASE SCHEDULING  
ORDER RE EXPERT DISCLOSURES  
(NO. 2:18-cv-00297-RSL) - 1

LAW OFFICES OF  
**MILLS MEYERS SWARTLING P.S.**  
1000 SECOND AVENUE, 30TH FLOOR  
SEATTLE, WASHINGTON 98104-1064  
TELEPHONE (206) 382-1000  
FACSIMILE (206) 386-7343

To rectify the expert discovery deadlines to be consistent with accepted practice and to conform more closely with the typical case scheduling order, the parties propose a change to the deadlines for the disclosure of expert testimony and the rebuttal expert disclosure, as follows:

	<b>Proposed Deadline</b>
Disclosure of expert testimony under FRCP 26(a)(2)	<del>January 9, 2019</del> July 8, 2019
Rebuttal expert disclosures/reports	<del>February 15, 2019</del> August 7, 2019
All motions related to discovery must be filed by ( <i>see</i> LCR 7(d))	September 4, 2019
Discovery completed by	September 6, 2019
Settlement conference held no later than	September 20, 2019
All dispositive motions must be filed and noted on the motion calendar no later than the fourth Friday thereafter ( <i>see</i> LCR 7(d)(3))	October 8, 2019
Plaintiff's Pretrial Statement	November 15, 2019
All motions <i>in limine</i> must be filed and noted on the motion calendar no earlier than the second Friday thereafter. Replies will be accepted.	December 6, 2019
Defendant's Pretrial Statement	November 20, 2019
Deadline for Conference of Counsel regarding Joint Pretrial Order	December 6, 2019
Exchange proposed jury instructions and verdict form	December 6, 2019
Exchange of deposition designations	December 6, 2019
Issue and serve trial subpoenas	December 23, 2019
Agreed pretrial order due	December 27, 2019
Exchange objections and cross-designations to deposition designations	December 12, 2019

Exchange objections to proposed jury instructions and verdict form	December 16, 2019
Pretrial conference to be scheduled by the Court	
Exchange objections to deposition cross-designation	December 19, 2019
Deadline to file deposition designations	December 23, 2019
Trial briefs, proposed voir dire, jury instructions, and trial exhibits due	December 30, 2019
Jury Trial Date	January 6, 2020

DATED: November 28, 2018.

KRUTCH LINDELL BINGHAM JONES, PS  
Attorneys for Plaintiff

MILLS MEYERS SWARTLING P.S.  
Attorneys for Defendant Delta Air Lines, Inc.

By: J. Nathan Bingham  
11/28/2018 E-mail Authority  
J. Nathan Bingham  
WSBA No. 46325  
Thomas W. Bingham  
WSBA No. 7575  
Jeffrey C. Jones  
WSBA No. 7670

By: s/Caryn Geraghty Jorgensen  
Caryn Geraghty Jorgensen  
WSBA No. 27514  
John Feters  
WSBA No. 40800  
Rachael R. Wallace  
WSBA No. 49778

STIPULATED MOTION FOR AMENDED CASE SCHEDULING  
ORDER RE EXPERT DISCLOSURES  
(NO. 2:18-cv-00297-RSL) - 3

LAW OFFICES OF  
**MILLS MEYERS SWARTLING P.S.**  
1000 SECOND AVENUE, 30TH FLOOR  
SEATTLE, WASHINGTON 98104-1064  
TELEPHONE (206) 382-1000  
FACSIMILE (206) 386-7343

**CERTIFICATE OF SERVICE**

I certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

James Nathan Bingham, jnb@krutchlindell.com, legalassistant@krutchlindell.com

Thomas William Bingham, twb@krutchlindell.com,  
legalassistant@krutchlindell.com

Jeffrey C. Jones, jcj@krutchlindell.com, legalassistant@krutchlindell.com

I further certify that I mailed a true and correct copy of the foregoing to the following non-CM/ECF participant:

and correct copy of the foregoing to the following non-CM/ECF participant:

N/A

DATED this 28th day of November 2018.

s/Karrie Fielder

Karrie Fielder